

COUNTY OF SUFFOLK



STEVE BELLONE  
SUFFOLK COUNTY EXECUTIVE

DENNIS M. BROWN  
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DEPARTMENT OF LAW

August 22, 2023

Hon. Margo K. Brodie, Chief U.S.D.J.  
United States Federal Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Newkirk v. County of Suffolk, et al.  
Docket No. 17-cv-2960 (MKB)(PK)

Dear Chief Judge Brodie:

The Suffolk County Attorney's Office represents Defendant Police Officer Mark Pav in the above-referenced matter. Plaintiff is represented by Michael Brown, Christopher Bianco and Brian Egan. The parties are in receipt of the Court's Order dated June 22, 2023 which granted our joint request for an extension of time to file the proposed joint pretrial order (JPTO) in this matter to August 25, 2023. While the parties have been in repeated contact working diligently to comply with this deadline and anticipated being able to complete the JPTO by said date as requested, we submit this request on behalf of both Plaintiff and Defendant to jointly respectfully request an additional thirty-day extension of time to September 29, 2023 to do so at this time.

We thank the Court for its consideration of this submission.

Respectfully submitted,

Dennis M. Brown  
Acting County Attorney  
By: /s/ Stacy A. Skorupa  
Stacy A. Skorupa  
Assistant County Attorney

CC: Counsel for all parties (via ECF)